

## **REMARKS**

### **Examiner Interview**

Applicant thanks the Examiner for the telephone interview on August 11, 2008 in which the Examiner and Applicant's counsel discussed the interpretation of Crawford and Applicant's invention as claimed. No agreement on patentability of the claims was reached.

### **Amendments**

#### **Amendments to the Claims**

Applicant has amended the claims to specify that the claimed new or modified audiovisual content is different than the existing audiovisual content. No new matter has been added as a result of these amendments because they are supported in the application as originally filed at, *intra alia*, paragraph 45, pages 17-18 (reusing the description of an image of an eye to generate a description of an image of a different eye).

### **Rejections**

#### **Rejections under 35 U.S.C. § 102(b)**

##### **Claims 1-15, 17, 20-34 and 37-41**

Claims 1-15, 17, 20-34 and 37-41 stand rejected under 35 U.S.C. § 102(B) as being anticipated by Crawford, U.S. Patent 5,895,784.

Crawford discloses an entertainment system that generates an audiovisual program, such as a video game, from a matrix of reusable story fragment (substories). The matrix represents hierarchical relationships between the substories that determine which substory is to be performed based on which pre-defined action is selected in a prior substory. A storyline for the game is generated from the substories performed as the game is played. Because the actions are pre-defined, the possible storylines are also pre-defined.

Applicant claims two different descriptions. The first description describes a concept depicted in an existing audiovideo content. The first description is used to generate the second or new description that describes a similar concept in a new or

modified audiovideo content, where the new or modified content is different than the existing audiovisual content.

The Examiner appears to be equating pre-defined storylines in Crawford with Applicant's claimed first and second (or new) descriptions, Crawford's video game with Applicant's claimed existing audiovisual content, and Crawford's reusable substories with Applicant's claimed reuse information. The Examiner also appears to be stating that generating one of the pre-defined storylines from a current pre-defined storyline as the game is played is equivalent to generating a second or new description as claimed by Applicant. However, because Crawford's substories are part of a single video game, reusing Crawford's substories can only generate one of the pre-defined storylines for the same video game, not a new storyline for a different video game. Thus, Crawford does not teach or suggest using a first description to generate a second or new description that describes a similar concept in different audiovideo content as claimed by Applicant.

Accordingly, Applicant respectfully submits that the invention claimed in claims 1-15, 17, 20-34 and 37-41 is not anticipated by Crawford under 35 U.S.C. § 102(b) and respectfully requests the withdrawal of the rejection of the claims.

### ***Rejections under 35 U.S.C. § 103***

#### **Claims 16, 18-19 and 35-36**

Claims 16, 18-19 and 35-36 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Crawford in view of Official Notice that dictionary mapping, graph operations, and object-oriented inheritance graphs are well known.

Claims 16, 18-19 and 35-36 depend from independent claims 1 and 31. Because Crawford does not teach or suggest using a first description to generate a second or new description that describes a similar concept in different audiovideo content as claimed by Applicant, the combination of Crawford and the Official Notice asserted by the Examiner does not disclose each and every limitation of the invention claimed in claims 16, 18-19 and 35-36.

Accordingly, Applicant respectfully submits that Applicant's invention as claimed in claims 16, 18-19 and 35-36 is not rendered obvious by Crawford, and respectfully request the withdrawal of the rejection under 35 U.S.C. § 103(a).

### SUMMARY

Claims 1-41 are currently pending. In view of the foregoing amendments and remarks, Applicant respectfully submits that the pending claims are in condition for allowance. Applicant respectfully requests reconsideration of the application and allowance of the pending claims.

If the Examiner determines the prompt allowance of these claims could be facilitated by a telephone conference, the Examiner is invited to contact Sue Holloway at (408) 720-8300 x3476.

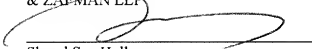
### Deposit Account Authorization

Authorization is hereby given to charge our Deposit Account No. 02-2666 for any charges that may be due. Furthermore, if an extension is required, then Applicant hereby requests such extension.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR  
& ZAFMAN LLP

Dated: March 17, 2007

  
\_\_\_\_\_  
Sheryl Sue Holloway  
Attorney for Applicant  
Registration No. 52,161

12400 Wilshire Boulevard  
Seventh Floor  
Los Angeles, CA 90025-1026  
(408) 720-8300 x3476